

# **EXHIBIT “I”**

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MASSACHUSETTS

3 \* \* \* \* \*

4 IN RE: PHARMACEUTICAL INDUSTRY )

5 AVERAGE WHOLESALE PRICE )

6 LITIGATION ) MDL DOCKET NO.

7 ) CIVIL ACTION

8 )) 01CV12257-PBS

9 D ))

10 THIS DOCUMENT RELATES TO: )

11 ALL ACTIONS )

12 )

13 D ))

14 \* \* \* \* \*

15  
16 HIGHLY CONFIDENTIAL

17 DEPOSITION OF LARRY YOUNG

18 TAKEN ON BEHALF OF THE DEFENDANTS

19 ON NOVEMBER 9, 2005, BEGINNING AT 10:06 A.M.

20 IN OKLAHOMA CITY, OKLAHOMA

21 \* \* \* \* \*

22 REPORTED BY: JANE McCONNELL, CSR, RPR, RMR, CRR

1 Q (BY MR. YOUNG) Let me narrow it a  
2 little bit. What knowledge do you have about the  
3 allegation that certain physician-administered  
4 prescription drugs -- I'm sorry, that your wife was  
5 charged for the following physician-administered  
6 drugs based in whole or in part on AWP?

7 MR. WILLIAMS: Objection, vague and  
8 ambiguous.

9 A I don't know.

10 Q (BY MR. YOUNG) You have no knowledge  
11 that these drugs were charged based on AWP?

12 MR. WILLIAMS: Same objection.

13 A No, I don't.

14 Q (BY MR. YOUNG) Following the sentence  
15 I just read here --

16 MR. SWEENEY: What was the answer to  
17 the question? I couldn't hear that.

18 MR. YOUNG: She'll read it back.

19 (Whereupon the court reporter read back  
20 the answer.)

21 Q (BY MR. YOUNG) I'm sorry. I started to  
22 ask you, after the sentence I just read you there's

1 Q And after [REDACTED] it lists five  
2 companies. Do you see that?

3 A Yeah.

4 Q Do you have any way of knowing of those  
5 companies -- strike that.

6 Do you have any way of knowing whether  
7 any of those companies manufactured the [REDACTED]  
8 that your wife received?

9 MR. WILLIAMS: Objection, vague.

10 A No.

11 Q (BY MR. YOUNG) Do you have any way of  
12 knowing which of those companies manufactured  
13 the [REDACTED] your wife received?

14 MR. WILLIAMS: Same objection.

15 A No.

16 Q (BY MR. YOUNG) Do you have any way of  
17 knowing with respect to all the drugs listed in  
18 Paragraph 19 which you've now had a chance to  
19 review which company -- strike that.

20 With respect to all the drugs in 19 which  
21 you've now had a chance to review, do you have a  
22 way of knowing which company manufactured that

1 drug that your wife received?

2 MR. WILLIAMS: I'll object on  
3 foundational grounds. The question is vague.

4 A As far as drug companies, no, I don't  
5 know which ones produced what medicines.

6 Q (BY MR. YOUNG) I don't know if anybody  
7 is still listening, but remember to keep your voice  
8 up.

9 A Okay.

10 Q I gather nobody is since nobody has  
11 yelled in awhile.

12 MR. SWEENEY: Some of us are still here.

13 (Discussion off the record.)

14 Q (BY MR. YOUNG) You had mentioned two  
15 drugs that you recognized, [REDACTED] and  
16 [REDACTED], and then I interrupted you. Are there  
17 any other drugs from this list that you recognize  
18 what treatment your wife would have received it  
19 for?

20 A Not that I know of. My recollection of --  
21 she took a lot of medications. So I don't know  
22 what. It would have to be looked at her medical